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Before the  
FEDERAL COMMUNICATIONS COMMISSION

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In the Matter of  
Telephone Number Portability

CC Docket No. 95-116

REPLY COMMENTS OF SBC COMMUNICATIONS, INC.

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## SUMMARY

SBC files these Reply Comments in response to certain of the issues raised by some of the 66 other commenting parties in this proceeding.

In the Comment cycle, most parties, including SBC, agreed that the Commission should assume a leadership role in developing a national number portability policy. The Commission should, however, defer to the expertise of industry organizations and standards bodies with respect to the technical details of policy implementation. SBC opposes state-by-state, piecemeal telephone number portability solutions.

End user demand, not artificial "triggering events," should determine the timeline for as well as the definition of telephone number portability. Unrealistic implementation timelines should not be imposed. Service provider portability for wireline services should be implemented when sufficient demand exists, when the network architecture for implementation is identified and agreed upon, when the appropriate costs are identified, and when those utilizing the service are willing and able to pay for it. Portability for wireless services should be considered separately from portability for wireline services. If location portability is mandated, it should be limited to the local calling area of a wireline carrier, i.e., at the most, the geographic area in an NPA where calls are placed on a local basis.

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<sup>1</sup>Abbreviations and acronyms used herein are defined in the text of these Reply Comments and have the same meaning as used therein.

Interim solutions to number portability create certain associated problems and are inadequate for long-term portability deployment. DID and RCF can be utilized on a limited basis as an interim solution. SBC opposes use of MCI's suggested CPC approach as either an interim or a long-term solution. That approach would waste both numbering resources and long-term portability development resources. AT&T's proposal, which identifies each switch in the network by a single 10-digit number, merits further study.

The long-term portability policy must recognize and address the unique issues associated with service provider portability associated with wireless services so that such policy does not create problems for customers' roaming arrangements. Also, any number portability solution developed by appropriate industry groups must support operator services functions.

Number portability related to non-geographic numbers (e.g., 500 numbers and 900 numbers) must be analyzed separately from number portability related to geographic numbers. Specifically, SBC asserts that service provider portability for 900 service providers will not result in reduced prices charged to customers, as some commenting parties alleged. Furthermore, service provider portability for 500 and 900 services cannot be implemented with the network architecture currently used for 800 service. Most fundamentally, SBC points out that no real benefits can be shown to derive from mandating 500/900 service provider portability.

Finally, SBC suggests that the Commission encourage good faith negotiations, in lieu of regulatory mandate, among all industry parties regarding the resolution of the specific, as well as broader, issues pertaining to the implementation of local number portability solutions.

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FEDERAL COMMUNICATIONS COMMISSION  
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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
Telephone Number Portability	)	CC Docket No. 95-116 RM 8535

REPLY COMMENTS OF SBC COMMUNICATIONS INC.

On July 13, 1995, the Commission adopted and released a Notice of Proposed Rulemaking ("Notice") in this docket. In the Notice, the Commission sought comment concerning an array of issues related to the portability of telephone numbers. On September 12, 1995, SBC Communications Inc. ("SBC") and 66 other parties filed initial Comments herein. Comments were filed by a variety of telecommunications industry participants, including local exchange carriers ("LECs"), cable television companies, interexchange carriers ("IXCs"), competitive access providers ("CAPs"), state regulators and other governmental agencies, wireless service providers, and others. In this Reply, SBC addresses certain of the points raised by commenting parties.

**I. MOST PARTIES AGREED THAT THE COMMISSION SHOULD ASSUME A LEADERSHIP ROLE IN DEVELOPING A NATIONAL NUMBER PORTABILITY POLICY BUT SHOULD DEFER TO THE EXPERTISE OF INDUSTRY ORGANIZATIONS AND STANDARDS BODIES WITH RESPECT TO THE TECHNICAL DETAILS OF POLICY IMPLEMENTATION.**

Generally, most parties agreed that the Commission should take a leadership role in developing a uniform national policy for number portability and allow the appropriate industry groups to develop the necessary technical rules and standards for implementation. A few parties, however, argued for state-by-state portability solutions<sup>1</sup> or suggested that the Commission should assume responsibility for developing technical standards.<sup>2</sup>

SBC submits that the necessary functionalities and interoperability requirements for deployment of the long-term number portability solution should be uniform throughout the nation. Deployment of different long-term portability solutions on a state-by-state basis would create an environment where there is a greater likelihood of problems with such elements as vendor specifications, technical interoperability, and economic inefficiencies. Multiple solutions would complicate development work by vendors, thus delaying the implementation and increasing the cost of number portability.

One current example in which state-by-state solutions have caused great difficulty across the nation is Caller Identifi-

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<sup>1</sup>See, e.g., Comments of NARUC at 5-7.

<sup>2</sup>See, e.g., Comments of Independent Telecommunications Network, Inc. at 1-2.

fication Services ("Caller ID"). In its Memorandum Opinion and Order on Reconsideration in CC Docket No. 91-281, the Commission stated that one of the causes of uncertainty and confusion was the varying state requirements intended to protect the privacy rights of calling and called parties on interstate calls.<sup>3</sup> The Commission also noted that "concern that lack of federal policy and varying state policies [with respect to Caller ID] created customer confusion influenced our decision to act [to formulate a single policy]."<sup>4</sup>

The Commission should not, however, establish technical standards. The standards bodies serve that purpose well. The Committee T1 sets standards and performs analyses of technical issues associated with North American telecommunications networks. Further, Committee T1 is committed to establishing consistent global standards, and, in that capacity, develops technical contributions for consideration in international standards bodies. Further, the Commission has neither the appropriate expertise nor an adequate staff to establish technical standards.

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<sup>3</sup>Memorandum Opinion and Order on Reconsideration, Second Report and Order, and Third Notice of Proposed Rulemaking, In the Matter of Rules and Policies Regarding Calling Number Identification Service, CC Docket No. 91-281, released May 5, 1995, at para. 4.

<sup>4</sup>Id.



**II. END USER DEMAND, NOT ARTIFICIAL "TRIGGERING EVENTS," SHOULD DETERMINE THE TIMELINE AS WELL AS THE PARAMETERS FOR PROVISION OF TELEPHONE NUMBER PORTABILITY.**

Sprint and Citizens Utility Company have argued for a phased-in approach to provision of telephone number portability, based on the release date of the Commission's order in this docket.<sup>5</sup> End user demand, however, should dictate when and where number portability will be deployed. While it might be reasonable to assume that the largest Metropolitan Statistical Areas ("MSAs") will be the targeted areas of the country for number portability deployment, it is not necessarily reasonable to take such an arbitrary approach for a phased-in deployment schedule. There is nothing wrong with an aggressive deployment of number portability, if end user demand exists, but eagerness to deploy number portability should be tempered by an understanding of how long it will take from the time the Commission issues an order until the requirements move through the industry and standards setting processes, vendor development, and deployment time.

Unrealistic implementation timelines should not be established for telephone number portability. While SBC does not want number portability to be unnecessarily delayed, neither should timelines be established that cannot economically or realistically be met. There are a number of basic steps that must be taken

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<sup>5</sup>Comments of Sprint at 11-12; Comments of Citizens Utility Company at 8.

before the long-term number portability solution can be implemented. These steps include the following:

- Commission action in this docket: The Commission must make certain fundamental decisions, including defining the type(s) and scope of telephone number portability that should be implemented.
- Industry activity: Appropriate industry groups must develop and establish the overall architecture that will be used to implement number portability; they must also establish an appropriate cost recovery mechanism, and design the number portability database(s).
- Standards bodies activities: Standards bodies must develop requirements for the hardware and/or software needed for number portability. A two-year standards development cycle is typical.
- Vendor activity: Vendors must develop the hardware and/or software for number portability. It is not unusual for the vendor development cycle to take two to three years.
- Telephone number portability must actually be deployed. Depending on the breadth of the network being deployed, it is not unusual for this cycle to take 12 to 18 months.
- E911/911 must be an integral part of any long-term number portability solution.<sup>6</sup>

To establish realistic deployment timelines, it is important to recognize that it would typically require four to five years for deployment of services or functionalities far less extensive than the proposals that are envisioned for number portability deployment.

Many commenting parties argued that the Commission should focus on service provider portability and that service and location

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<sup>6</sup>Comments of Texas Advisory Commission on State Emergency Communications at 3; generally, see Comments of National Emergency Numbering Association.

portability should be developed later, only after sufficient market demand and willingness to pay surfaces, and after service provider portability issues are resolved.<sup>7</sup> SBC reiterates its position that service provider portability for wireline services should be implemented when sufficient demand exists, when the network architecture for implementation is identified and agreed upon, when the appropriate costs are identified, when adequate cost recovery mechanisms are available, and when those utilizing the service are willing to pay for such. SBC also reiterates that service provider portability for wireless services should be considered separately from wireline service provider portability because of the unique problems and issues associated with wireless portability.<sup>8</sup>

While SBC, as well as many other commenting parties, agrees that the Commission's first priority should be service provider portability, it also recognizes that in the setting of existing technology, location portability must also be considered. Currently, new alternative local exchange carriers ("ALECs") may serve an entire metropolitan exchange through a single switch and could easily offer their customers location portability. The embedded LEC's network, however, employs multiple central office switches in a metropolitan exchange, which means that its customers

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<sup>7</sup>Comments of Time Warner Communications Holdings, Inc. at 3-4.

<sup>8</sup>Comments of SBC, Appendix F.

may face a telephone number change if they move across town to a different central office area.<sup>9</sup>

To ensure parity among providers, SBC recommends that if location portability is mandated, it should be limited to the local calling area of a wireline carrier, i.e., at the most, the geographic area in an NPA where calls are placed on a local basis. Services that depend on the geographic definition of an NPA to determine the allowable calling scope or the actual carrier for a given call (as is the case for 800 database service) would be rendered unusable if telephone numbers are allowed to be transported across NPA boundaries.

**III. THE INDUSTRY SHOULD BE GIVEN THE OPPORTUNITY TO RESOLVE SPECIFIC NUMBER PORTABILITY ISSUES THROUGH A NEGOTIATION PROCESS RATHER THAN THROUGH REGULATORY MANDATE.**

As the Commission is aware, telephone number portability is a specific item on the competitive checklist contained in the proposed federal telecommunications legislation. While the Commission has generally assumed responsibility for establishing specific rules and regulations with respect to the implementation of interstate services, SBC suggests that the Commission encourage good faith negotiations, in lieu of regulatory mandate, among all industry parties regarding the resolution of the specific, as well as broader, issues pertaining to the implementation of local number

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<sup>9</sup>The embedded switching hierarchy and network addressing scheme make telephone numbers geographic-location specific and service provider specific.

portability solutions.<sup>10</sup> For example, instead of establishing specific guidelines for rate design, the Commission could allow the industry the opportunity to negotiate a rate among those providing local number portability and those utilizing it. This approach could also be used when determining other aspects of local number portability, such as database design or database administration.

This negotiated approach has several advantages. It will relieve the Commission from the burden of establishing a myriad of specific rules and regulations. It will allow the Commission to focus its efforts on broad policy development, not specific rules and regulations. It will encourage the industry to adopt the role envisioned in the pending federal telecommunications legislation of resolving issues through negotiation rather than through rule-making. Of course, if the parties cannot reach agreement through good faith negotiations within a reasonable, established timeframe, then arbitration procedures (such as those outlined in the Alternative Dispute Resolution process) could be followed.

SBC urges the Commission to seriously consider adopting this approach as it addresses issues related to local telephone number portability.

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<sup>10</sup>See, Comments of SBC at 9-10, outlining the steps necessary to implement a long-term telephone number portability solution.

**IV. PROPOSED INTERIM SOLUTIONS TO TELEPHONE NUMBER PORTABILITY ARE INADEQUATE FOR LONG-TERM PORTABILITY DEPLOYMENT.**

Two commenting parties argued that Direct Inward Dialing ("DID") and Remote Call Forwarding ("RCF") are not workable solutions to interim provision of number portability. ACTA called those solutions obstructionist and costly.<sup>11</sup> AT&T questioned the value of RCF to business customers "because it limits the number of calls that may be placed simultaneously to a single "ported" number."<sup>12</sup> While SBC acknowledges that DID and RCF are not suitable for use as a long-term number portability solution, SBC firmly believes that DID and RCF can be utilized on a limited basis as an interim portability solution.

Three other commenting parties claimed that DID and RCF should be provided free of charge to local service providers,<sup>13</sup> a proposal that is untenable. Clearly, the LECs incur costs when providing DID and RCF and should be allowed to charge rates to recover the costs; just as clearly, local service providers should pay for services to which they subscribe.<sup>14</sup>

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<sup>11</sup>Comments of America's Carriers Telecommunications Association at 2,13.

<sup>12</sup>Comments of AT&T at 11-12.

<sup>13</sup>Comments of NCTA at 12-13; Comments of AdHoc at 12,20; Comments of TWC at 21-22.

<sup>14</sup>The suggestion (by LDDS at 2) to provide local service at wholesale prices is also untenable as well as completely irrelevant to this proceeding. Local service is not currently priced as a retail service; therefore it is inappropriate to consider wholesale pricing of existing local exchange service until those services are rebalanced to recover their costs.

SBC does not support MCI's proposal for a Carrier Portability Code ("CPC") approach to number portability, either as an interim or a long-term solution.<sup>15</sup> MCI proposes using NPA codes to identify local carriers, thereby removing 7.92 million telephone numbers per carrier with a CPC, from the available North American Numbering Plan ("NANP") resource. Using NPAs in this fashion would result in premature exhaust of the NANP. In addition to the number resource problem, additional technical development would also be needed before the service could be implemented. The use of the CPC approach, even on an interim basis, would: (1) require significant investment for deployment that would be discarded when a long-term database solution is deployed, (2) require dilution of resources needed for development of a long-term database solution and would serve only to delay implementation of that solution, and (3) would result in duplication of expenses associated with the implementation of two different database solutions that require different switch triggers.<sup>16</sup>

While SBC believes that AT&T's proposal, which identifies each switch in the network by a single 10-digit number, may require

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<sup>15</sup>AT&T indicates, at 31, that the CPC proposal would serve well as a transitional "bridge" to a permanent number portability solution. SBC strongly opposes AT&T's suggestions in that regard.

<sup>16</sup>For example, switch triggers which were provisioned for the CPC solution would need to be reprovisioned under location routing number (LRN) since it uses different triggers. Likewise, the SCP translations for CPC and LRN are different and would need to be entered twice.

upgrades of some switches and other significant development work,<sup>17</sup> it does appear to make minimal demand on NANP resources and does merit further study.

**V. THE UNIQUE PROBLEMS AND ISSUES ASSOCIATED WITH WIRELESS NUMBER PORTABILITY MUST BE CONSIDERED.**

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As SBC noted in its initial Comments, the wireless industry presents unique problems and issues for number portability because of differences in current network technology, the mobile nature of wireless customers, and the heavy reliance on NPA/NXX block assignment to a single wireless carrier, particularly in conjunction with roaming.<sup>18</sup> Unfortunately, some parties filing comments focus only on what they perceive to be the benefits of wireless number portability without addressing, or even acknowledging, the potential problems and costs associated with such portability.<sup>19</sup> Other parties, particularly those with substantial

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<sup>17</sup>AT&T contends that CPC is compatible with LRN. However, the two solutions rely on different triggering mechanisms in the switch. Current experience with AIN triggers has shown that feature interaction issues depend on what switch triggers are used and changing switch triggers often modifies how features behave as perceived by end users. Thus, the transition from the CPC solution to LRN would not be as smooth as AT&T suggests and may not be transparent to end users. Furthermore, the CPC plan routes calls to a specific service provider, not to a specific location in that service provider's network. This potentially results in suboptimal routing. Thus, the transition to LRN from CPC would likely result in significant trunk rearrangements to optimize network routing by creating direct routes to multiple locations within a service provider's network where traffic volumes warrant such measures.

<sup>18</sup>Comments of SBC, Appendix F, at 1-7.

<sup>19</sup>Comments of National Wireless Resellers Association at 1-3; Comments of Omnipoint Corporation at 1-7.



investments in current wireless networks, recognize the potential impact of wireless number portability and caution against proceeding haphazardly without significant industry input and standards development.<sup>20</sup>

SBC disagrees with Omnipoint Corporation's contention that "competition for the customers of the . . . wireless incumbent is at the heart of the issue in number portability."<sup>21</sup> To the contrary, the customer should be at the heart of the issue -- that is, the ability of the customer to enjoy the full benefits of the wireless service to which he has grown accustomed at a reasonable price should be at the heart of this inquiry. If wireless service provider number portability is implemented in such a way that it significantly eliminates the customer's ability to roam or increases the cost of wireless service beyond the customer's ability or willingness to pay, then the customer is not being well served.

The inquiry into wireless number portability presents unique issues and problems that must be considered separately from the wireline inquiry.<sup>22</sup> Some parties question whether there is even

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<sup>20</sup>Comments of Bell Atlantic NYNEX Mobile, Inc. at 1-4; Comments of Cellular Telecommunications Industry Association ("CTIA") at 10-11; Comments of Nextel at 7-8; Comments of MCI at 3; Comments of the Personal Communications Industry Association at 5.

<sup>21</sup>Comments of Omnipoint Corporation at 1 [emphasis supplied].

<sup>22</sup>See, Comments of SBC, Appendix F, at 1; Comments of Bell Atlantic NYNEX Mobile, Inc. at 1; Comments of Nextel at 7.

a need for wireless number portability.<sup>23</sup> The Commission, should it decide to pursue wireless number portability, must defer to industry committees to develop standards and to determine the technical and economic feasibility of such portability.<sup>24</sup>

**VI. ANY NUMBER PORTABILITY SOLUTION DEVELOPED BY APPROPRIATE INDUSTRY GROUPS MUST SUPPORT OPERATOR SERVICES FUNCTIONS.**

SBC agrees with the numerous parties who also recognize that any intermediate or long-term number portability solution must support operator services functions and allow all carriers to properly bill and rate calls. The Commission should allow appropriate industry groups to evaluate the impact of the various number portability proposals on operator services call processing; the Commission should not use this docket to attempt to establish technical solutions or performance standards.

AT&T implies that the LRN (Location Routing Number) proposal "can support additional operator services functions, such as busy line verification, emergency interrupt, and Line Information Database ("LIDB") access for calls requiring alternative billing."<sup>25</sup> AT&T also predicts that "[w]ith certain call processing changes, these features could be made available by using LRN as a 'pointer' to the operator service position serving the 'ported'

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<sup>23</sup>See, e.g., Comments of Bell Atlantic NYNEX at 2-3.

<sup>24</sup>Comments of CTIA at 2-3.

<sup>25</sup>Comments of AT&T Corp. at 21.

customer."<sup>26</sup> Despite these reassuring claims, it is impossible to assess the complete impact of the LRN proposal without a thorough technical systems evaluation of the impact on each type of operator services call.

For example, the LRN solution would require the routing query to be performed by the next-to-last ("N-1") carrier.<sup>27</sup> On local and intraLATA alternately billed calls, the operator services switch would need to launch two common channel (SS7) queries: a LIDB query for traditional calling card, collect, or third-number billing validation, and a query to a number portability database for network routing. Modifications to the operator services switch, billing records, and to the LIDB would be required to process and route these calls and billing messages in a number portability environment.

MCI predicts the Carrier Portability Code ("CPC") approach will be compatible with operator services and will not affect the LIDB.<sup>28</sup> SBC suggests that MCI meant to state that "[b]ecause CPC does not affect the format of the billing (not called-party) number, it does not affect the LIDB."<sup>29</sup> SBC cautions that significant changes to the LIDB will probably be necessary to support any form of number portability in a competitive local exchange

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<sup>26</sup>Id. at 21.

<sup>27</sup>Id. at 19.

<sup>28</sup>Comments of MCI at 14.

<sup>29</sup>Id. at 14.

environment. These changes are needed to ensure proper identification of the company serving the originating line and the billing account for call screening and message routing.

MCI further states that "[o]perator service calls would be handled as usual" and that [o]nce the operator services platform hands the call off to its serving switch, a database query occurs and the call will complete via the new service provider."<sup>30</sup> SBC cautions that operator services systems may differ widely in their architecture and it is likely that there will be varying impacts on each operator services architecture. For example, the SBC Traffic Operator Position System ("TOPS") is closely integrated with the DMS-200 switch, which, in some instances, may also be serving as an access tandem. Therefore, it may be necessary for the TOPS switch to perform the database query -- not a switch serving the operator services "platform" as described by MCI.

SBC shares Bell Atlantic's concern that MCI's CPC routing and addressing scheme may adversely impact busy line verification in cases where operators that are requested to perform busy line verification on a ported number may not be able to identify the switch serving the ported number."<sup>31</sup>

SBC does agree with MCI's suggestion that it is logical for the appropriate LIDB owner to store data associated with line

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<sup>30</sup>Id. at 14.

<sup>31</sup>Comments of Bell Atlantic at 13.

numbers ported to competitive local exchange providers.<sup>32</sup> SBC is willing to offer LIDB services to all competitors under the same terms and conditions currently offered to independent companies.

In the absence of 10-digit Global Title Translations, all queries will continue to route to the appropriate LIDB based on the assigned "NPA-NXX" combination. GTE points out the impracticality of 10-digit translations and states that the "time and resources needed to maintain tables of this size would be enormous and resulting call set-up delay significant."<sup>33</sup>

MFS correctly states that the "number portability system should interface with . . . [LIDBs] so that collect and third-party calls charged to 'ported' numbers can be billed correctly and other LIDB functions can be performed."<sup>34</sup> SBC also agrees with MFS' observation that state-sponsored trials of local number portability technologies should be encouraged to help "clarify the relative strengths and weaknesses of each approach. . ."<sup>35</sup> The objectives of these trials should include a comprehensive test of operator services call types (e.g., automated, semi-automated, operator-assisted, 0+, 0-, DA, Intercept, Coin) and interaction with the LIDB from different switch manufacturers and operator services platforms. This testing will help to determine the impact on

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<sup>32</sup>Comments of MCI at 14-15.

<sup>33</sup>Comments of GTE at 8.

<sup>34</sup>Comments of MFS Communications at 11.

<sup>35</sup>Id. at 7.

operation and billing procedures. These state trials, however, are no substitute for a comprehensive, national solution designed to ensure interoperability and compliance with industry standards.

SBC also urges the Commission to carefully consider the comments filed by the Yellow Pages Publishers Association ("YPPA"), which describes the "significant ramifications that telephone number portability is likely to have on the directory publishing industry."<sup>36</sup> SBC considers directory publishing and directory assistance activities to be closely related and traditionally reliant upon the geographical association between NPA-NXX and community name.<sup>37</sup> BellSouth also recognizes that the impact to directory activities must not be overlooked and states that the NPA-NXX combination is used to scope geographic areas into "communities of interest."<sup>38</sup> Any criteria designed to assess the feasibility of a number portability solution should include an examination of the impact on directory publishing and directory assistance activities.

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<sup>36</sup>Comments of the Yellow Pages Publishers Association at 2.

<sup>37</sup>Comments of SBC, Appendix "D" at 2.

<sup>38</sup>Comments of BellSouth at 45.

**VII. NUMBER PORTABILITY RELATED TO NON-GEOGRAPHIC NUMBERS MUST BE ANALYZED SEPARATELY FROM NUMBER PORTABILITY RELATED TO GEOGRAPHIC NUMBERS.**

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**A. SERVICE PROVIDER PORTABILITY FOR 900 SERVICE PROVIDERS WILL NOT RESULT IN REDUCED PRICES FOR CONSUMERS.**

Several commenting parties claimed that the introduction of service provider portability for 900 service would reduce the cost of providing 900 services and thus would result in reduced prices for consumers. This conclusion is not supported in the record. In order for prices to decrease, information providers must reduce the charges for each call. As AT&T pointed out, the portion of the information provider's program charge that results from the interexchange carrier's fees is extremely small.<sup>39</sup> The major portion of the price per call is directly related to the information provider's pricing policy. There is no significant relationship between the fees charged by the carrier and the information provider's ultimate charge to the caller; thus, it is impossible to extrapolate that a reduction in this one minor cost element will result in any significant reduction in prices charged to the consumer.

In fact, as demonstrated by TELEMATION<sup>40</sup> and Scherers,<sup>41</sup> costs may even be increased due to the increased administrative burdens placed on the carriers to manage the comings and goings of

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<sup>39</sup>Comments of AT&T Corp. at 41-42.

<sup>40</sup>Comments of TELEMATION International, Inc. at 2-3.

<sup>41</sup>Comments of Scherers Communications Group, Inc. at 3.

information providers and the corresponding demands of the federal law, the Telephone Disclosure and Dispute Resolution Act ("TDDRA"), enacted October 1992, that governs pay-per-call services. Scherers is correct in its evaluation of the TDDRA requirements of carriers and billing agents and their relationships with information providers. The Commission's own rules adopted to implement TDDRA would be very difficult to follow in a portability environment. At the very least, the issues raised by Scherers and TELEMATION should be further investigated by the Commission before any order mandating 900 portability is adopted.

Teleservices also asserted that service provider portability for 900 service will result in lower prices, with the broad comment that "increased choice will result in lower prices."<sup>42</sup> MCI requested the Commission to require local exchange carriers to provide detailed information concerning implementation costs of such service provider portability.<sup>43</sup> As pointed out above, however, these commenting parties do not provide any facts or arguments that would support their proposition that service provider portability for 900 service would result in any price reductions for consumers.

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<sup>42</sup>Comments of Teleservices Industry Association at 3.

<sup>43</sup>Comments of MCI at 31-33



**B. SERVICE PROVIDER PORTABILITY FOR 500 AND 900 SERVICES CANNOT BE IMPLEMENTED WITH THE NETWORK ARCHITECTURE CURRENTLY USED FOR 800 SERVICE.**

Some commenting parties suggested that the intelligent network ("IN") architecture that is used to provide 800 database service can easily be adapted to offer 500/900 portability. Time Warner stated that the current IN platforms can perform full local number portability within six months after an order is adopted by the Commission.<sup>44</sup> Teleservices claimed that 900 portability should be implemented concurrently with the deployment of 888 service (scheduled to be completed in March 1996).<sup>45</sup> These assertions reveal a basic lack of understanding of the local exchange network and its capabilities.

IN technology was developed to perform queries based on the dialed digits "800." No other triggers were built into the technology. A process is currently underway whereby the IN functionality will be enhanced to include "888" dialing; "877" may also be included, with future toll-free access codes being considered for later implementation. This effort began with the development of switch requirements by local exchange carriers in late 1994 and early 1995. The switch vendors have been working on the code throughout 1995. Even with pressure from the industry and the Commission to advance the delivery dates, the majority of LECs

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<sup>44</sup>Comments of Time Warner Communications Holdings, Inc. at 13-14.

<sup>45</sup>Comments of Teleservices at 7-8.